

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

IN RE:

BISON GLOBAL LOGISTICS, INC. § **Case No. 17-11154-tmd**
Debtor § **(Chapter 11)**

**DEBTOR'S EXPEDITED MOTION FOR SALE OF PROPERTY
FREE AND CLEAR OF LIENS
(2016 International 4300 Durastar)**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COME NOW, Bison Global Logistics, Debtor herein, and file this Expedited Motion for Sale of Property Free and Clear of liens (2016 International 4300 Durastar) and in support thereof would show the following:

1. By this Motion, the Debtor seeks permission to sell a 2016 International 4300 Durastar Truck Cab and Chassis (VIN 3HAMMMMLXGL180257) with 24' Morgan Dry Freight Van Body (S/N MTX16VB49226001) and Interlift ILT-35 Liftgate (S/N 98112007) (the "Vehicle") to Gene Hoskins, P.O. Box 347, Smithville, TX 78957 for \$60,525.00.
2. On September 14, 2017 (the "Petition Date"), Debtor filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Western District of Texas, Austin Division ("Court"), thereby commencing this chapter 11 case ("Case"). Debtor continues in possession of its property and it is operating and managing its business as a debtor in possession pursuant to the provisions of 11 U.S.C. §§ 1107(a) and 1108.
3. No trustee or examiner has been appointed in the Debtor's Chapter 11 Case, nor has a creditors' committee or other official committee been appointed pursuant to 11 U.S.C. § 1102.

4. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1334 and 157. This Motion is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A). Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

5. The basis for the relief herein is primarily grounded in 11 U.S.C. §363(f).

6. The Vehicle is subject to a lien in favor of Equify. Equify filed a Motion for Relief from Automatic Stay which was settled with an agreement to sell the Vehicle.

7. On January 29,, 2018, the Debtor received an offer to purchase the Vehicle for \$60,525.00, a true and correct copy of which is attached as Exhibit A. The proposed purchaser is prepared to fund the transaction immediately.

8. The Debtor scheduled the Vehicle at \$55,000.00. Therefore, the Debtor believes that the sales price is fair. Under the agreement with Equify, the Debtor may sell the Vehicle for a minimum price of \$50,000.00. As of November 1, 2017, the amount of the debt to Equify was \$59,227.15. The sales proceeds should satisfy the debt to Equify without any excess proceeds.

9. Under 11 U.S.C. §363(f)(2), the trustee may sell property free and clear of liens if the lender consents. Based on the agreement with Equify, the Debtor believes that Equify consents to the sale. All proceeds shall be paid directly to Equify.

10. The Court has granted the U.S. Trustee's Motion to Dismiss Case with such order to be effective as of February 12, 2018 at 5:00 p.m. The Court also allowed any party to request that an exception to 11 U.S.C. §349(b) be granted. Debtor requests that the Court order that the order granting this Motion will survive the dismissal of the case.

WHEREFORE, Debtor requests that the Court authorize the sale of the Vehicle to Gene Hoskins free and clear of liens and grant any other and further relief to which Debtor is entitled

Respectfully Submitted,

BARRON & NEWBURGER, P.C.
7320 N. Mopac Expy, Suite 400
Austin, Texas 78731
(512) 649-3243
(512) 476-9253 Facsimile

/s/ Stephen Sather
Stephen Sather
State Bar No 17657520

**ATTORNEY FOR DEBTOR,
BISON GLOBAL LOGISTICS**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 5, 2018 a true and correct copy of the above and foregoing *Motion for Sale of Property Free and Clear of Liens* was served upon the parties on the attached Matrix by United States Mail, first class, postage prepaid.

/s/ Stephen Sather
Stephen Sather

SECOND MASTER SERVICE LIST
(January __, 2018)

United States Trustee:

Henry G. Hobbs,
Deborah Bynum
Office of the U.S. Trustee
903 San Jacinto Blvd., Room 230
Austin, TX 78701
henry.g.hobbs@usdoj.gov
deborah.a.bynum@usdoj.gov

Debtor:

Bison Global Logistics, Inc
Attn: Tommy Love
1201 S. Heatherwilde Blvd
Pflugerville, TX 78660

Proposed Professionals for Debtor:

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Secured Creditors (cont'd):

People's United Equip Finance
PO Box 181
Brattleboro, VT 05302

Probilling Funding & Service
401 Lee St, Suite 500 NE
Decatur, AL 35601

R Bank
3600 E. Palm Valley Blvd
Round Rock, TX 78665

Secured Creditors:

Equify Financial
777 Main Street
Ft. Worth, TX 76102

Frontier Bank
PO Box 551
Elgin, TX 78621

PACCAR Financial Corp.
PO Box 1518
Bellevue, WA 98004

Toyota Financial Services
PO Box 650686
Dallas, TX 75265

Volvo Financial Services
PO Box 7247
Philadelphia, PA 19170

Twenty Largest Unsecured Creditors:

Internal Revenue Service
Attn: Special Procedures
300 E. 8th Street, Stop 5026 AUS
Austin, TX 78701

Perdue Brandon
1616 S. Kentucky, Suite 200 Bldg. D
Amarillo, TX 79102

Xtra Lease
662 N. WW White Rd
San Antonio, TX 78219

Bank Direct Capital Finance
150 N. Field Drive, Suite 190
Lake Forest, IL 60045

Twenty Largest Unsecured Creditors
(cont;d):

Fleet One
MSC 30425
PO Box 415000
Nashville, TN 37241-5000

Echo Global Logistics
600 West Chicago Ave
Chicago, IL 60654

Jordan 55
2435 Burbank St
Dallas, TX 75235

Fred R. Langley & Companies
520 W. Summit Hill Dr., Suite 1201
Knoxville, TN 37902

All-Ways Leasing
10650 Culver's Rd #104-508
San Antonio, TX 78251

Frontier Bank
PO Box 569130
Dallas, TX 75356

Rusty Tomasek
3122 Matador Drive
Belton, TX 76513

City of Austin
PO Box 2267
Austin, TX 78768-2267

Alliance One
Receivables Mgt
6160 Mission George Rd., Suite 300
San Diego, CA 92120

Tex-Con Oil
1701 Grand Ave Pkwy
Pflugerville, TX 78660

FreightPros
3307 Northland Drive, Suite 360
Austin, TX 78731

LNO Tire Company
PO Box 65181
San Antonio, TX 78265

Bexar County Tax Collector
PO Box 839950
San Antonio, TX 78282-3950

Stratton Wright & Ziemer Ins
5712 Colleyville Blvd., Suite 240
Colleyville, TX 76034

Taylor Oil
3701 N. Sylvania Ave
Ft. Worth, TX 76137

McGuire Tire, LLC
603 S. 1st Street
Temple, TX 76504

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January 29, 2018

I am Gene Hoskins I want to purchase the 2016 International Truck from Equify. \$60,525.00

E Hoskins

Gene Hoskins